

EXHIBIT B

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ALTIMEO ASSET MANAGEMENT,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

QIHOO 360 TECHNOLOGY CO. LTD.,
HONGYI ZHOU, XIANGDONG QI and
ERIC X CHEN,

Defendants.

Case No.: 2:19-cv-01619

**DECLARATION OF KARINA
SHREEFER IN SUPPORT OF
SERVICE UPON DEFENDANTS
HONGYI ZHOU AND
XIANGDONG QI**

I, Karina Shreefer, declare under penalty of perjury pursuant to 28 U.S.C.
§ 1746 as follows:

1. I am an attorney and international litigation consultant employed by
Shreefer Law Firm, LLC in Merriam, Kansas. For the past 15 years I have advised
attorney clients on how to properly serve foreign defendants pursuant to
international treaties and statutes, including service upon defendants located in the
People's Republic of China ("China").

2. I have been in communication with counsel for Lead Plaintiffs
Altimeo Asset Management and ODS Capital LLC at Pomerantz LLP for several
months to advise on the service of process upon defendants Hongyi Zhou and
Xiangdong Qi. On June 4, 2019, Pomerantz LLP engaged the Shreefer Law Firm,

1 LLC to effect service of process upon defendants Hongyi Zhou and Xiangdong Qi
2 in China.

3
4 3. China is a signatory to the Hague Convention of 15 November 1965
5 on the Service Abroad of Judicial and Extrajudicial Documents in Civil or
6 Commercial Matters (“Hague Convention”), a multilateral treaty regulating
7 service of process among member nations.
8

9
10 4. Rule 4f(1) of the Federal Rules of Civil Procedure provides for
11 service on defendants located in foreign countries by “any internationally agreed
12 means of service that is reasonably calculated to give notice, such as those
13 authorized by the Hague Convention on the Service Abroad of Judicial and
14 Extrajudicial Documents.” In addition, the United States Supreme Court has held
15 that the Hague Convention “provide a simpler way to serve process abroad, to
16 assure that defendants sued in foreign jurisdictions would receive actual and
17 timely notice of suit, and to facilitate proof of service abroad.” *See*
18 *Volkswagenwerk AG v. Schlunk*, 486 US 694, 698 (1988).
19
20
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22 5. Pursuant to its declarations to the Hague Convention, China permits
23 service in its country only via the Chinese government, effected by submitting a
24 Hague Service Request to the Chinese Central Authority (“CA”) located within
25 the Chinese Ministry of Justice in Beijing.
26
27

1 6. In order to commence service via the CA, litigants must submit a
2 Hague Service Request with the documents to be served attached in English along
3 with a Chinese translation. The CA reviews the Request for compliance with the
4 Treaty and then forwards it to the Chinese Supreme Court. The Chinese Supreme
5 Court then distributes the Request to a lower court having jurisdiction over the
6 defendant. The lower court will then be responsible for service.
7

8
9 7. Until late 2016, service in China through the Hague Convention took
10 about 9-to-12 months. More recently, the turnaround time has increased to
11 18-to-24 months. In addition, while China sometimes fails to execute service
12 requests that are properly submitted through the Hague Convention, that result
13 will not be known until after extensive delay.
14

15
16 8. Since I was retained by Lead Plaintiffs' counsel, I coordinated the
17 translation into Chinese of the documents to be served on Hongyi Zhou and
18 Xiangdong Qi, and completed the Hague Requests for their service.
19

20
21 9. On July 8, 2019 I sent via FedEx to the Chinese Central Authority
22 Hague Requests, including the required documents, for Hongyi Zhou, a copy of
23 which is attached hereto as Exhibit 1, and Xiangdong Qi, a copy of which is
24 attached hereto as Exhibit 2.
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed in Merriam, Kansas this 10th of July 2019.

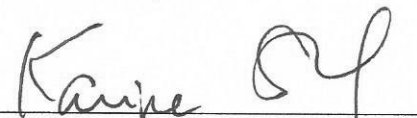
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5 Karina Shreefer, Esq.
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EXHIBIT 1

HAGUE REQUEST FOR HONGYI ZHOU

**REQUEST
FOR SERVICE ABROAD OF JUDICIAL OR EXTRAJUDICIAL DOCUMENTS**

*DEMANDE
AUX FINS DE SIGNIFICATION OU DE NOTIFICATION A L'ÉTRANGER
D'UN ACTE JUDICIAIRE OU EXTRAJUDICIAIRE*

Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or
Commercial Matters, signed at The Hague, November 15, 1965.

*Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires en matière civile
ou commerciale, signée à La Haye, le 15 Novembre 1965.*

Identity and address of the applicant
Identité et adresse du requérant

Karina J. Shreefer, Esq.
SHREEFER LAW FIRM, LLC
5820 Knox Street
Merriam, KS 66203
UNITED STATES OF AMERICA
Tel. 1.913.933.6222
Karina@ShreeferLaw.com

Address of receiving authority
Adresse de l'autorité destinataire

Ministry of Justice of China
International Legal Cooperation Center (ILCC)
No. 33, Pinganli Xidajie, Xicheng District, Beijing 100035
PEOPLE'S REPUBLIC OF CHINA
Tel: +86.10.5560.4537
Fax: +86.10.5560.4538
lvyllee319@vip.sina.com

The undersigned applicant has the honour to transmit in duplicate the document listed below and, in conformity with article 5 of the above-mentioned Convention, requests prompt service of one copy thereof on the addressee, i.e.,

(identity and address)

Le requérant soussigné a l'honneur de faire parvenir—en double exemplaire—à l'autorité destinataire les documents ci-dessous énumérés, en la priant conformément à l'article 5 de la Convention précitée, d'en faire remettre sans retard un exemplaire au destinataire, savoir:

(identité et adresse) Hongyi Zhou, at his place of employment:

Qihoo 360 Technology Co., Ltd., Building 2, 6 Haoyuan, Jiuxianqiao Road, Chaoyang District, Beijing, People's Republic of China 100015

- ☒ (a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention.* Service in accordance with the laws of the PRC for service of documents in its territory
(a) selon les formes légales (article 5, alinéa premier, lettre a).
- ☐ (b) in accordance with the following particular method (sub-paragraph (b) of the first paragraph of article 5)*:
(b) selon la forme particulière suivante (article 5, alinéa premier, lettre b):

- ☐ (c) by delivery to the addressee, if he accepts it voluntarily (second paragraph of article 5)*:
(c) le cas échéant, par remise simple (article 5, alinéa 2):

The authority is requested to return or to have returned to the applicant a copy of the documents—and of the annexes*—with a certificate as provided on the reverse side.

Cette autorité est priée de renvoyer ou de faire renvoyer au requérant un exemplaire de l'acte—et de ses annexes—avec l'attestation figurant au verso.

THE PERSONS AND ENTITIES WITHIN THE UNITED STATES COMPETENT TO FORWARD SERVICE REQUESTS PURSUANT TO ARTICLE 3 INCLUDE ANY COURT OFFICIAL; ANY ATTORNEY; OR ANY OTHER PERSON OR ENTITY AUTHORIZED BY THE RULES OF THE COURT. (See U.S. declarations to the 1965 Convention at Hague Conference website: http://www.hcch.net/index_en.php?act=authorities.details&aid=279).

List of documents provided in duplicate, in English and in Chinese

Énumération des pièces

Summons in a Civil Action

Civil Cover Sheet

Certification and Notice of Interested Parties

Class Action Complaint for Violations of the Federal Securities Laws

Done at Merriam, Kansas, U.S.A., the 8 July 2019

Fait à _____, le _____

Signature and/or stamp.

Signature et/ou cachet.

Karina

*Delete if inappropriate
Rayer les mentions inutiles.

(Formerly OBD-116 which was formerly LAA-116,
both of which may still be used)

USM-94
(Est. 11/22/77)

CERTIFICATE
ATTESTATION

The undersigned authority has the honour to certify, in conformity with article 6 of the Convention,
L'autorité soussignée a l'honneur d'attester conformément à l'article 6 de ladite Convention,

1) that the document has been served *

1. que la demande a été exécutée

- the (date)

- le (date)

- at (place, street, number)

- à (localité, rue numéro)

- in one of the following methods authorised by article 5-

-dans une des formes suivantes prévues à l'article 5:

☐ (a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention*.

a) selon les formes légales (article 5, alinéa premier, lettre a).

☐ (b) in accordance with the following particular method*:

b) selon la forme particulière suivante :

☐ (c) by delivery to the addressee, who accepted it voluntarily. *

c) par remise simple

The documents referred to in the request have been delivered to:

Les documents mentionnés dans la demande ont été remis à:

-(identity and description of person)

-(identité et qualité de la personne)

-(relationship to the addressee (family, business, or other):

-liens de parenté, de subordination ou autres, avec le destinataire de l'acte:

2) that the document has not been served, by reason of the following facts*:

2. que la demande n'a pas été exécutée, en raison des faits suivants:

In conformity with the second paragraph of article 12 of the Convention, the applicant is requested to pay or reimburse the expenses detailed in the attached statement*.

Conformément à l'article 12, alinéa 2, de ladite Convention, le requérant est prié de payer ou de rembourser les frais dont le détail figure au mémoire ci-joint.

Annexes

Annexes

Documents returned:

Pièces renvoyées:

Done at

Fait à

, the

, le

In appropriate cases, documents establishing the service:

Le cas échéant, les documents justificatifs de l'exécution:

Signature and / or stamp.

Signature et / ou cachet.

***Delete if inappropriate.**

Rayer les mentions inutiles,

SUMMARY OF THE DOCUMENT TO BE SERVED
ELEMENTS ESSENTIELS DE L'ACTE

Convention on the service abroad of judicial and extrajudicial documents in civil or commercial matters, signed at The Hague, November 15, 1965.
Convention relative à la signification et à la notification à l'étranger des actes judiciaires et extrajudiciaires en matière civile ou commerciale, signée à La Haye, le 15 Novembre 1965.

(article 5, fourth paragraph)
 (article 5, alinéa 4)

Name and address of the requesting authority:

Nom et adresse de l'autorité requérante : Karina Shreefer, Esq., SHREEFER LAW FIRM, LLC
 5820 Knox Street, Merriam, Kansas, 66203 U.S.A.
 Tel. 1.913.933.6222, Karina@ShreeferLaw.com

Particulars of the parties*:

Identité des parties : Altimeo Asset Management, Individually and on behalf of All Others Similarly Situated, *Plaintiff(s)*, v. Qihoo 360 Technology Co. Ltd., **Hongyi Zhou**, Xiangdong Qi and Eric X Chen, *Defendants*.

JUDICIAL DOCUMENT**
ACTE JUDICIAIRE

Nature and purpose of the document:

Nature et objet de l'acte : To give notice to the defendant that a lawsuit has been filed against him and to summon him to answer.

Nature and purpose of the proceedings and, where appropriate, the amount in dispute:

Nature et objet de l'instance, le cas échéant, le montant du litige : A Class Action Complaint has been filed against the defendant.

Date and place for entering appearance:**

Date et lieu de la comparution : Within 21 days after service of the summons, not counting the day received, defendant must serve on the plaintiff an answer to the complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or the plaintiff's attorney whose name and address are: Jennifer Pafiti, Pomerantz LLP, 1100 Glendon Avenue, 15th Floor, Los Angeles, California 90024, USA. Defendant must also file his answer or motion with the court: First Street US Courthouse, 350 W. 1st St., Ste. 4311, Los Angeles, CA 90012, USA.

Court which has given judgment:**

Jurisdiction qui a rendu la décision : N/A

Date of judgment:**

Date de la décision : N/A

Time limits stated in the document:**

Indication des délais figurant dans l'acte : Within 21 days after service of the summons, not counting the day received, defendant must serve on the plaintiff an answer to the complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or the plaintiff's attorney and must also be filed with the court. If the defendant fails to respond, judgment by default will be entered against him for the relief demanded in the complaint.

EXTRAJUDICIAL DOCUMENT**
ACTE EXTRAJUDICIAIRE

Nature and purpose of the document:

Nature et objet de l'acte : N/A

Time limits stated in the document:**

Indication des délais figurant dans l'acte : N/A

* If appropriate, identity and address of the person interested in the transmission of the document.
 S'il y a lieu, identité et adresse de la personne intéressée à la transmission de l'acte.

** Delete if inappropriate.

Rayer les mentions inutiles.

WARNING
AVERTISSEMENT

identity and address of the addressee
identité et adresse du destinataire

HONGYI ZHOU

At his place of employment: Qihoo 360 Technology Co. Ltd.
Building 2, 6 Haoyuan, Jiuxianqiao Road
Chaoyang District, Beijing 100015
People's Republic of China

IMPORTANT

THE ENCLOSED DOCUMENT IS OF A LEGAL NATURE AND MAY AFFECT YOUR RIGHTS AND OBLIGATIONS. THE "SUMMARY OF THE DOCUMENT TO BE SERVED" WILL GIVE YOU SOME INFORMATION ABOUT ITS NATURE AND PURPOSE. YOU SHOULD, HOWEVER, READ THE DOCUMENT ITSELF CAREFULLY. IT MAY BE NECESSARY TO SEEK LEGAL ADVICE.

IF YOUR FINANCIAL RESOURCES ARE INSUFFICIENT YOU SHOULD SEEK INFORMATION ON THE POSSIBILITY OF OBTAINING LEGAL AID OR ADVICE EITHER IN THE COUNTRY WHERE YOU LIVE OR IN THE COUNTRY WHERE THE DOCUMENT WAS ISSUED.

ENQUIRIES ABOUT THE AVAILABILITY OF LEGAL AID OR ADVICE IN THE COUNTRY WHERE THE DOCUMENT WAS ISSUED MAY BE DIRECTED TO:

Legal Aid Foundation of Los Angeles
Ron Olson Justice Center
1550 W. 8th Street
Los Angeles, California 90017
USA
Tel.: 1.800.399.4529

TRÈS IMPORTANT

LE DOCUMENT CI-JOINT EST DE NATURE JURIDIQUE ET PEUT AFFECTER VOS DROITS ET OBLIGATIONS. LES "ÉLÉMENTS ESSENTIELS DE L'ACTE" VOUS DONNENT QUELQUES INFORMATIONS SUR SA NATURE ET SON OBJET. IL EST TOUTEFOIS INDISPENSABLE DE LIRE ATTENTIVEMENT LE TEXTE MÊME DU DOCUMENT. IL PEUT ÊTRE NÉCESSAIRE DE DEMANDER UN AVIS JURIDIQUE.

SI VOS RESSOURCES SONT INSUFFISANTES, RENSEIGNEZ-VOUS SUR LA POSSIBILITÉ D'OBTENIR L'ASSISTANCE JUDICIAIRE ET LA CONSULTATION JURIDIQUE SOIT DANS VOTRE PAYS SOIT DANS LE PAYS D'ORIGINE DU DOCUMENT.

LES DEMANDES DE RENSEIGNEMENTS SUR LES POSSIBILITÉS D'OBTENIR L'ASSISTANCE JUDICIAIRE OU LA CONSULTATION JURIDIQUE DANS LE PAYS D'ORIGINE DU DOCUMENT PEUVENT ÊTRE ADRESSÉES :

*Legal Aid Foundation of Los Angeles
Ron Olson Justice Center
1550 W. 8th Street
Los Angeles, California 90017
USA
Tel.: 1.800.399.4529*

EXHIBIT 2

HAGUE REQUEST FOR XIANGDONG QI

**REQUEST
FOR SERVICE ABROAD OF JUDICIAL OR EXTRAJUDICIAL DOCUMENTS**

*DEMANDE
AUX FINS DE SIGNIFICATION OU DE NOTIFICATION A L'ÉTRANGER
D'UN ACTE JUDICIAIRE OU EXTRAJUDICIAIRE*

Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or
Commercial Matters, signed at The Hague, November 15, 1965.

*Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires en matière civile
ou commerciale, signée à La Haye, le 15 Novembre 1965.*

Identity and address of the applicant

Identité et adresse du requérant

Karina J. Shreefer, Esq.
SHREEFER LAW FIRM, LLC
5820 Knox Street
Merriam, KS 66203
UNITED STATES OF AMERICA
Tel. 1.913.933.6222
Karina@ShreeferLaw.com

Address of receiving authority

Adresse de l'autorité destinataire

Ministry of Justice of China
International Legal Cooperation Center (ILCC)
No. 33, Pinganli Xidajie, Xicheng District, Beijing 100035
PEOPLE'S REPUBLIC OF CHINA
Tel: +86.10.5560.4537
Fax: +86.10.5560.4538
lvylee319@vip.sina.com

The undersigned applicant has the honour to transmit in duplicate the document listed below and, in conformity with article 5 of the above-mentioned Convention, requests prompt service of one copy thereof on the addressee, i.e.,
(identity and address)

Le requérant soussigné a l'honneur de faire parvenir—en double exemplaire—à l'autorité destinataire les documents ci-dessous énumérés, en la priant conformément à l'article 5 de la Convention précitée, d'en faire remettre sans retard un exemplaire au destinataire, savoir:

(identité et adresse) Xiangdong Qi, at his place of employment:

Qihoo 360 Technology Co., Ltd., Building 2, 6 Haoyuan, Jiuxianqiao Road, Chaoyang District, Beijing, People's Republic of China 100015

☒ (a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention.* **Service in accordance with the laws of the PRC for service of documents in its territory**
(a) selon les formes légales (article 5, alinéa premier, lettre a).

☐ (b) in accordance with the following particular method (sub-paragraph (b) of the first paragraph of article 5)*:
(b) selon la forme particulière suivante (article 5, alinéa premier, lettre b):

☐ (c) by delivery to the addressee, if he accepts it voluntarily (second paragraph of article 5)*:
(c) le cas échéant, par remise simple (article 5, alinéa 2).

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Class Action Complaint for Violations of the Federal Securities Laws

Done at Merriam, Kansas, U.S.A., the 8 July 2019

Fait à _____, le _____

Signature and/or stamp.

Signature et/ou cachet.

Karina

*Delete if inappropriate
Rayer les mentions inutiles.

CERTIFICATE
ATTESTATION

The undersigned authority has the honour to certify, in conformity with article 6 of the Convention,
L'autorité soussignée a l'honneur d'attester conformément à l'article 6 de ladite Convention,

1) that the document has been served *

1. que la demande a été exécutée

- the (date)

- le (date)

- at (place, street, number)

- à (localité, rue numéro)

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-dans une des formes suivantes prévues à l'article 5:

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Les documents mentionnés dans la demande ont été remis à:

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-(identité et qualité de la personne)

-(relationship to the addressee (family, business, or other):

-liens de parenté, de subordination ou autres, avec le destinataire de l'acte:

2) that the document has not been served, by reason of the following facts*:

2. que la demande n'a pas été exécutée, en raison des faits suivants:

In conformity with the second paragraph of article 12 of the Convention, the applicant is requested to pay or reimburse the expenses detailed in the attached statement*.

Conformément à l'article 12, alinéa 2, de ladite Convention, le requérant est prié de payer ou de rembourser les frais dont le détail figure au mémoire ci-joint.

Annexes

Annexes

Documents returned:

Pièces renvoyées:

Done at

Fait à

, the

, le

In appropriate cases, documents establishing the service:

Le cas échéant, les documents justificatifs de l'exécution:

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Signature et / ou cachet.

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(article 5, fourth paragraph)
 (article 5, alinéa 4)

Name and address of the requesting authority:

Nom et adresse de l'autorité requérante : Karina Shreefer, Esq., SHREEFER LAW FIRM, LLC
 5820 Knox Street, Merriam, Kansas, 66203 U.S.A.
 Tel. 1.913.933.6222, Karina@ShreeferLaw.com

Particulars of the parties*:

Identité des parties : Altimeo Asset Management, Individually and on behalf of All Others Similarly Situated, *Plaintiff(s)*, v. Qihoo 360 Technology Co. Ltd., Hongyi Zhou, Xiangdong Qi and Eric X Chen, *Defendants*.

JUDICIAL DOCUMENT**
ACTE JUDICIAIRE

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Nature et objet de l'acte : To give notice to the defendant that a lawsuit has been filed against him and to summon him to answer.

Nature and purpose of the proceedings and, where appropriate, the amount in dispute:

Nature et objet de l'instance, le cas échéant, le montant du litige : A Class Action Complaint has been filed against the defendant.

Date and place for entering appearance:**

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Jurisdiction qui a rendu la décision : N/A

Date of judgment:**

Date de la décision : N/A

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EXTRAJUDICIAL DOCUMENT**
ACTE EXTRAJUDICIAIRE

Nature and purpose of the document:

Nature et objet de l'acte : N/A

Time limits stated in the document:**

Indication des délais figurant dans l'acte : N/A

* If appropriate, identity and address of the person interested in the transmission of the document.

**S'il y a lieu, identité et adresse de la personne intéressée à la transmission de l'acte.*

** Delete if inappropriate.

Rayer les mentions inutiles.

WARNING
AVERTISSEMENT

identity and address of the addressee
identité et adresse du destinataire

XIANGDONG QI

At his place of employment: Qihoo 360 Technology Co. Ltd.
Building 2, 6 Haoyuan, Jiuxianqiao Road
Chaoyang District, Beijing 100015
People's Republic of China

IMPORTANT

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